

Federal Defenders  
OF NEW YORK, INC.

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December 27, 2017

**By ECF, Hand and Email**

The Honorable Margo K. Brodie  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: United States v. Keston Lett 17-CR-628 (MKB)**

Your Honor:

As Your Honor is aware, this Court granted Mr. Lett bail on December 15, 2017. The bond was perfected on December 18, 2017 and Mr. Lett was ordered released by Magistrate Judge Steven M. Gold. However, Mr. Lett was not released, he was transferred to ICE custody. The defendant intends to file a motion with this Court to compel his release, or, in the alternative to dismiss the indictment with prejudice. *See United States v. Benzadon Boutin*, 17-CR-590 (DLI) (E.D.N.Y. Dec. 26, 2017); *United States v. Ventura*, No. 17-CR-418 (DLI), 2017 WL 5129012 (E.D.N.Y. Nov. 3, 2017); *United States v. Trujillo-Alvarez*, 900 F. Supp. 2d 1167, 1179 (D. Or. 2012).

The parties have agreed to the following proposed motion schedule for defendant's motion to dismiss the indictment:

Defendant's Motion:	December 28, 2017
Government Response:	January 11, 2017
Defendant's Reply:	January 18, 2017

Respectfully Submitted,

\_\_\_\_\_/s/  
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c.c. AUSA David L. Lizmi